

From: Gillian's Mail [gillian@openadopt.com]
Sent: Wednesday, October 15, 2003 7:46 PM
To: adoptionregs@state.gov
Subject: Hague Response



Hague Letter.doc

Hard copy to follow in mail.

Gillian J. Freney, Counselor/Mediator
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Open Adoption & Family Services, Inc.

OCT 27 2003

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October 16, 2003

U.S Dept of State
CA/OCS/PRI, Adoption Regulations Docket Room, SA-29
2201 C St. N.W.
Washington D.C. 20520

Dear Hague Regulation Committee,

The following is a comment regarding docket number State/AR-01/96:
Section 93.37 (f) of the Hague Regs dated September 15, 2003 states that a homestudy must be completed by an adoption agency employee with a masters degree in social work or a related field. Typically, employees that complete homestudies work under the direction of masters level supervisors who oversee and approve their reports. Currently, most homestudies across the country are being completed by non-supervisory employees. Sending all non-supervisory employees back to school to receive masters degrees is not only unnecessary but would be unduly costly to agencies and would take years to complete. Even the National Council on Accreditation does not impose this requirement on adoption agency employees. Many non-supervisory adoption agency employees have years of adoption experience that provide them with the insight necessary to complete high quality homestudies. At the very least, their valuable experience should be taken into consideration. I suggest that this requirement be removed. If that is not possible, it would be reasonable to grandfather in existing employees at the time the Hague Regulations are implemented.

Sincerely,



Gillian J. Freney

Open Adoption & Family Services, Inc.



Open Adoption & Family Services, Inc.

Nov 26 2003

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October 9, 2003

Dear Hague Regulation Committee,

The following is a comment regarding docket number State/AR-01/96:

Section 93.37 (f) of the Hague Regs dated September 15, 2003 states that a homestudy must be completed by an adoption agency employee with a masters degree in social work or a related field. As the co-president of the Coalition of Oregon Adoption Agencies and as the Executive Director of Open Adoption and Family Services, I can sincerely express that this is unnecessary and unrealistic. Typically, employees that complete homestudies work under the direction of masters level supervisors who oversee and approve their reports. Currently, most homestudies across the country are being completed by non-supervisory employees. Sending all non-supervisory employees back to school to receive masters degrees is not only unnecessary but would be unduly costly to agencies and would take years to complete. Even the National Council on Accreditation does not impose this requirement on adoption agency employees. Many non-supervisory adoption agency employees have years of adoption experience that provide them with the insight necessary to complete high quality homestudies. At the very least, their valuable experience should be taken into consideration. I suggest that this requirement be removed. If that is not possible, it would be reasonable to grandfather in existing employees at the time the Hague Regulations are implemented.

Sincerely,

Shari Levine

Executive Director

Open Adoption & Family Services

Open Adoption & Family Services, Inc.



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DEC 20 10:13
BUREAU OF
CONSULAR AFFAIRS

November 20, 2003

Dear Hague Regulation Committee,

The following is my second comment regarding docket number State/AR-01/96:
Section 93.37 (f) of the Hague Regs dated September 15, 2003 states that adoption agencies must have an annual audit. As the co-president of the Coalition of Oregon Adoption Agencies and as the Executive Director of Open Adoption and Family Services, I can sincerely express that this is unnecessary and unrealistic. Complete audits cost \$5,000.00 - \$7,000.00 per year, while reviews are more reasonable, costing \$3,500.00 - \$5,500.00 per year. The 990 form, which non-profits have to submit annually cost only \$2,000.00 and have an accounting of how the non-profits funds are being utilized. The 990 form, which is intended to be accessible to the public, would meet the Hague's requirements without unduly burdening agencies. If the Hague Regs result in financially burdening agencies, it is likely the agencies will pass increased costs on to the adoptive parents, which will only drive up the costs of adoption. Let's work together to keep that from happening.

Sincerely,

Shari Levine

Shari Levine

Executive Director

Open Adoption & Family Services